

**EXHIBIT “D”**

DECLARATION OF DARRELL W. SCOTT

L&A TIME DETAIL			
ZAI Time included in 19572-001 (Libby)			
Date/Tkpr	Description [Shows ZAI-related only]	ZAI-RELATED Hours	Fees
3/3/2000 DWS	Phone call to TURkewitz regarding testing of homes; additional phone conference with Barbanti regarding testing of exemplar home; travel to testing site and inspection of insulation.	1.00	\$240.00
3/13/2000 DWS	phone call to Marco Barbanti regarding testing; phone call from Richard Hatfield;	0.20	\$48.00
3/22/2000 DWS	(Zonolite - Review and revise state product liability complaint; draft press release regarding same.	1.75	\$420.00
3/27/2000 DWS	Phone conference with Marco Barbanti; phone conference with Molita Okimeta; review research regarding Zonolite.	1.40	\$336.00
3/28/2000 BAH	telephone call with Phyllis Thurlow regarding the zonolite insulation in her attic; telephone call with Arthur Saylor regarding the zonolite insulation throughout his home.	0.30	\$22.50
4/11/2000 KLB	Telephone call from Darrell W. Scott regarding Nationwide Zonolite class action to be filed in Montana; review Complaint; prepare press release for Nationwide class action regarding Zonolite Attic Insulation.	0.65	\$68.25
4/13/2000 BAH	telephone call with Robert Keyes regarding his zonolite insulation.	0.20	\$15.00
4/14/2000 DWS	study Grace exhibits regarding Zonolite Attic Insulation and website updates; revisions to affidavit of Busch.	0.50	\$120.00
4/17/2000 DWS	Phone call from Fulcrum regarding testing results; phone call from Benny King regarding completion of affidavit; phone call from Rob Turkewitz regarding test results; work on draft of King affidavit; meeting with King regarding affidavit and case status; work on draft of affidavit of Busch. Meeting with Busch regarding affidavit and case status.	5.20	\$1,248.00
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L&A TIME DETAIL			
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4/18/2000 DWS	Phone call to Fulcrum regarding test results; phone conference with Rob Turkewitz and Don Hurst regarding test results; phone conference with all counsel regarding case status; additional phone calls from Chad Trent regarding TEM testing; prepare affidavits and documentary exhibits from Lieff Cabraser.	0.60	\$144.00
4/19/2000 DWS	Phone conference with Fulcrum Environmentla; phone conference with Rob Turkewitz regarding affidavits; revisions to affidavit of Hatch, Busch, and King; review additional test results from Fulcrum; phone conference with Don Hurst regarding test results.	1.05	\$252.00
4/28/2000 DWS	phone conference with Rob Turkewitz and Rand Hatch regarding test results and affidavit; phone call to Marco Barbanti	0.30	\$72.00
5/9/2000 DWS	Phone call from Don Hurst regarding testing at additional homes; phone call to Fabrice Vincent regarding same; review additional exhibit materials	0.50	\$120.00
5/16/2000 DWS	Meeting with Paul Sublette regarding editing of Hurst video; review and revise memorandum and motion regarding notice program; additional meeting with Paul Sublette; review revised testing tape.	1.00	\$240.00
8/7/2000 MGB	{Price} Review MDL motion; telephone conference with class counsel regarding MDL motion.	1.10	\$192.50
8/15/2000 MRF	Attended sampling at Thurman residence.	10.00	\$1,500.00
8/21/2000 KLB	(National Zonolite) Review information filed by defendants requesting Zonolite MDL	0.25	\$26.25
9/20/2000 KLB	(Price) office conference with Tamara Driscoll regarding revisions to Notice of Deposition and Subpoena Duces Tecum to Richard Lee; prepare Subpoena Duces Tecum; office conference with Samantha regarding obtaining process server to serve Suboena on rush basis in Pennsylvania; revise and finalize certificate of service; revise and finalize letter to witness; instructions regarding service and filing of same.	1.20	\$126.00
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Date/Tkpr	Description [Shows ZAI-related only]	ZAI-RELATED Hours	Fees
10/10/2000 DWS	Review and revise Opposition to Continuance of Price Emergency Notice.	0.30	\$75.00
11/2/2000 KLB	Telephone call from Tamara Driscoll regarding Price depositions and upcoming events.	0.20	\$24.00
11/6/2000 DWS	Phone conference with co-counsel regarding case status and assignment of tasks; review reply brief regarding class certification in Price.	0.60	\$150.00
11/7/2000 MGB	Review material regarding briefing on Motions for Preliminary Injunction and Disqualification of Lieff Cabraser in federal class actions.	1.25	\$231.25
12/4/2000 KLB	Review information regarding Zonolite MDL.	0.20	\$24.00
12/11/2000 KLB	(Price) review correspondence regarding call to Zonolite counsel and information on MDL.	0.30	\$36.00
12/15/2000 KLB	(Price) Review pleadings in Price; review Subpoenas and Notices of Deposition for update to discovery; telephone call to Shannon at Allan McGarvey's office regarding depositions that have occurred in Price; update database regarding same; letter to Milberg Weiss regarding depositions taken in Barbanti and Price.	0.75	\$90.00
12/21/2000 DWS	Review Memorandum Decision of O'Connor regarding disqualification and Motion for Injunctive Relief; phone call to Elizabeth Cabraser regarding same; phone call to Robert Tgurkewitz regarding same; conferene with Donald Stone regarding Case Management Order No. 5.	1.60	\$400.00
12/21/2000 MGB	Briefing and memorandum; review orders) regarding disqualification of counsel and emergency notice; review correspondence with conferences with; conference with Darrell W. scott regarding same.	1.25	\$243.75
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12/27/2000 KLB	Review Discovery Requests to WR Grace (Price).	0.25	\$30.00
1/3/2001 DWS	(PRICE)-Travel to Boston for hearing with Judge saris; review proposed case management order; work on chronology of cases in preparation for conference with all co-counsel; preparation for hearing with Judge Saris; phone conference with paralegal regarding renoting of motion for notice; review and revise order regarding disqualification of counsel.	9.40	\$2,350.00
1/3/2001 KLB	Review pleadings in all matters regarding upcoming deadlines; prepare materials for meeting with Judge Saris; obtain Lindholm Complaint; office conference with Michael G. Black regarding committees; Prepare Master calendar of all matteris; Retrieve Federal Court dockets for all MT Federal actions and other Zonolite federal actions; memo to Darrell w. Scott regarding information for meeting with Judge Saris.	2.25	\$270.00
1/4/2001 DWS	(PRICE)-Conference with all co-counsel regarding coordination of claim and case management issues; hearing before Judge Saris regarding case management; meetings with co-counsel regarding case management.	8.00	\$2,000.00
1/5/2001 DWS	(PRICE)-Travel from Boston to Spokane; meeting with litigation team regarding case assignments and file management issues.	8.00	\$2,000.00
1/5/2001 KLB	Office conference with Darrell w. Scott regarding hearing before Judge Saris and strategy meeting on Price case.	0.75	\$90.00
1/12/2001 DWS	Meeting with Michael G. Black regarding Boston conference call regarding Grace bankruptcy and strategic planning; phone call to Fabrice Vincent regarding same; meeting with bankruptcy team regarding potential bankruptcy of Grace; draft memorandum to Nancy Davis; prepare memorandum to Fabrice Vincent regarding bankruptcy.	2.35	\$587.50
1/18/2001 KLB	(Price) Review documents regarding certification briefing deadlines and proposed scheduling order.	0.20	\$24.00
1/19/2001 KLB	(Price) review documents from other counsel relating to MDL 1376 committees and scheduling; pull case law relating to Simon decision and Sun Oil; review memorandum regarding sections to add to class certification brief; telephone call from and to Milberg Weiss paralegal Michele Walbrat regarding work to be done on class certification brief; review email.	1.25	\$150.00
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Date/Tkpr	Description [Shows ZAI-related only]	ZAI-RELATED Hours	Fees
1/19/2001 KLB	(Price) Begin review of Brief; review appendixes; download and convert Brief; emails to and from Fabrice; Begin check of Blue Book regarding citations to books and other secondary authorities.	3.25	\$390.00
1/20/2001 KLB	(Price) Shepardize case law in Class Certification Brief; fax to Fabrice attaching shepards reports of negative treatment; print citations and key decisions; begin cite checking and shepardizing brief; emails to and from Fabrice; pull unpublished opinions and Federal Express same to Boston office of Lieff Cabraser for inclusion in materials provided to Judge; communications to and from paralegal at Milberg Weiss regarding cite checking; check quotes; download revised brief and format same.	9.25	\$1,110.00
1/21/2001 KLB	(Price) Transfer corrections to revised version of brief; Continue cite checking and checking quotes and authorities in class certification brief; email to and from Fabrice; fax brief with changes to Fabrice.	8.75	\$1,050.00
1/22/2001 KLB	(Price) Office conference with Darrell W. Scott regarding status of class certification brief; email to and from paralegal Michele Walbrett regarding same; email from Fabrice.	0.80	\$96.00
1/22/2001 KLB	(Price) review Bluebook on U.S. cites and practitioner's notes.	0.25	\$30.00
3/29/2001 TRH	Conference with litigation team members regarding brief in opposition to defendants' motion for discretionary review.	0.40	\$60.00
3/30/2001 TRH	Review and revise plaintiffs' brief in opposition to defendants' motion for discretionary review	1.50	\$225.00
8/20/2002 BDJ	Meeting with co-counsel for ZAI claims; conference with Kristy L. Bergland regarding documents to opposing counsel.	1.45	\$174.00
		91.75	\$17,101.00
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